

**FILED**

JAN 16 2008

**Board of Vocational Nursing  
and Psychiatric Technicians**

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**BEFORE THE  
BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. VN-2004-491

**CATHERINE MARIE BYKOWSKI, a.k.a.  
CATHERINE MARIE RANKIN, a.k.a.  
CATHERINE MARIE SANDERS**  
7511 Creekside Lane  
Citrus Heights, CA 95610

**A C C U S A T I O N**

Vocational Nurse License No. VN 76003

Respondent.

Teresa Bello-Jones, J.D., M.S.N., R.N. ("Complainant") alleges:

**PARTIES**

1. Complainant brings this Accusation solely in her official capacity as the Executive Officer of the Board of Vocational Nursing and Psychiatric Technicians ("Board"), Department of Consumer Affairs.

**Vocational Nurse License**

2. On or about February 4, 1977, the Board issued Vocational Nurse License No. VN 76003 to Catherine Marie Bykowski ("Respondent"), also known as Catherine Marie Rankin and Catherine Marie Sanders. The Vocational Nurse License will expire on July 31, 2009, unless renewed.

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1 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation  
2 and enforcement of the case.

3 **FIRST CAUSE FOR DISCIPLINE**

4 **(Criminal Conviction)**

5 8. Respondent has subjected her license to discipline under Code section  
6 2878, subdivision (f), in that on November 23, 2004, in the Superior Court, County of Placer, in  
7 the matter entitled *People vs. Catherine Marie Bykowski* (Super. Ct. Placer Cty., 2004, Case  
8 Number 62-43174), Respondent was convicted by the court on her plea of nolo contendere to a  
9 violation of Vehicle Code section 23152, subdivision (a) (driving under the influence of alcohol),  
10 a misdemeanor; and, Penal Code section 273, subdivision (a) (child abuse/endangerment - great  
11 bodily injury or death likely), a felony. The circumstances of the crime are that on or about April  
12 21, 2004, Respondent was arrested for driving under the influence of alcohol. Also in the vehicle  
13 with Respondent at the time of her arrest was a minor child, aged 4 years. Such conduct is  
14 substantially related to the qualifications, functions, and duties of a licensed vocational nurse.

15 **SECOND CAUSE FOR DISCIPLINE**

16 **(Criminal Conviction Involving Alcoholic Beverages)**

17 9. Respondent has subjected her license to discipline under Code section  
18 2878, subdivision (a), on the grounds of unprofessional conduct, as defined in Code section  
19 2878.5, subdivision (c), in that Respondent has been convicted of a crime involving alcoholic  
20 beverages, as set forth in paragraph 8, above.

21 **THIRD CAUSE FOR DISCIPLINE**

22 **(Used Alcoholic Beverages to an Extent or in a Manner Dangerous  
23 or Injurious to Herself or Others)**

24 10. Respondent has subjected her license to discipline under Code section  
25 2878, subdivision (a), on the grounds of unprofessional conduct, as defined in Code section  
26 2878.5, subdivision (b), in that on or about April 21, 2004, Respondent used alcoholic beverages  
27 to an extent or in a manner dangerous or injurious to herself or others, as set forth in paragraph  
28 8, above.

1 **PRAYER**

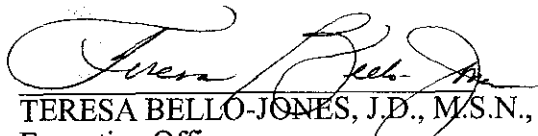
2 **WHEREFORE**, Complainant requests that a hearing be held on the matters  
3 herein alleged, and that following the hearing, the Board of Vocational Nursing and Psychiatric  
4 Technicians issue a decision:

5 1. Revoking or suspending Vocational Nurse License No. VN 76003, issued  
6 to Catherine Marie Bykowski, also known as Catherine Marie Rankin and Catherine Marie  
7 Sanders;

8 2. Ordering Catherine Marie Bykowski, also known as Catherine Marie  
9 Rankin and Catherine Marie Sanders to pay the Board of Vocational Nursing and Psychiatric  
10 Technicians the reasonable costs of the investigation and enforcement of this case, pursuant to  
11 Code section 125.3; and,

12 3. Taking such other and further action as deemed necessary and proper.

13 DATED: January 16, 2008  
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17 TERESA BELLO-JONES, J.D., M.S.N., R.N.  
18 Executive Officer  
19 Board of Vocational Nursing and Psychiatric Technicians  
20 Department of Consumer Affairs  
21 State of California  
22 Complainant  
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